

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)

v.)

VLADISLAV KLYUSHIN)
Defendant)

CRIMINAL NO. 21-cr-10104-PBS

DEFENDANT VLADISLAV KLYUSHIN'S MOTION TO CONTINUE TRIAL

Now comes the Defendant, Vladislav Klyushin, by and through undersigned counsel, pursuant to the Fifth and Sixth Amendments, and hereby respectfully moves this Honorable Court for a continuance of trial in this matter to January 30, 2023 (or as soon thereafter in February 2023 as is convenient to the Court) and further requests this Honorable Court to issue a Pretrial Scheduling Order consistent with the new trial date, *see Dkt. 72*. As detailed *infra*, a continuance is necessary to permit Mr. Klyushin additional time to prepare for trial, including his continued review of more than 2.3 million records produced in discovery, and to fully litigate motions to dismiss and suppress currently due September 13, 2022. The translator scheduled for trial, Alex Tetradze, reported to the undersigned that he is available in January and February of 2023 if this Honorable Court reschedules the trial. The government takes no position on this request, *see infra*.

On December 19, 2021, Mr. Klyushin was extradited to the United States on the four count Indictment alleging conspiracy to obtain unauthorized access to computer networks and to commit wire fraud and securities fraud, substantive wire fraud, unauthorized access to a computer, and securities fraud. *Dkt. 8*. Mr. Klyushin has been held without bail since his arrival to the United States. During the May 9, 2022, Bail Appeal hearing, this Honorable Court,